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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

ROY D. CALHOUN, aka "Lucky",
MARISSA M. MAYERS, aka "Mia"
and "Jewels", and
DAMIEN J. HARRIS,

Defendants.

SECRET INDICTMENT

Case No. 3:10CR464
Judge Carr / KNEPP

Title 18, Sections 1591(a)(1), (b)(1),
and (b)(2), 371, 2421, 2422(a) and 2,
United States Code

Count 1

The Grand Jury charges:

1. From some time in 2007, and continuing to the date of return of this indictment, in the Northern District of Ohio, and elsewhere, the defendants, ROY D. CALHOUN, aka "Lucky", MARISSA M. MAYERS, aka "Mia" and "Jewels", and DAMIEN J. HARRIS, did knowingly and willfully conspire and agree with one another, and with other persons known and unknown to the grand jury, to commit offenses against the United States, including (a) sex trafficking of children, in violation of Title 18, U.S.C. §§ 1591(a)(1) and (b)(2); (b) sex

trafficking by force, fraud, and coercion, in violation of Title 18, U.S.C. §§ 1591(a)(1) and (b)(1); (c) transportation in interstate commerce with intent to engage in prostitution, in violation of Title 18, U.S.C. § 2421; and (d) persuading, inducing, enticing and coercing any individual to travel in interstate commerce to engage in prostitution, in violation of Title 18, U.S.C. § 2422(a).

Manner and Means

2. The objects of the conspiracy were to be accomplished, among other manners and means, as follows:

- a. defendants CALHOUN, MAYERS, and HARRIS would recruit females, including minors, to work as prostitutes, for the benefit of the defendants;
- b. defendants CALHOUN and MAYERS would provide the recruited females with instructions as to the charges for various sexual acts, how to avoid and evade law enforcement, and the requirement to turn over to defendants the proceeds of prostitution and other sexual acts;
- c. defendant CALHOUN would have sexual intercourse with the females recruited to work for him;
- d. defendants CALHOUN, MAYERS, and HARRIS transported females, including minors, to engage in prostitution and other illicit sexual conduct, at hotels, motels, and other locations, including places outside the State of Ohio;
- e. defendant CALHOUN would collect all or part of the proceeds earned by the females for acts of prostitution and other commercial sex acts;

f. defendant MAYERS, would and did travel in interstate commerce, with others not indicted herein, to engage in prostitution and other commercial sex acts, and would provide all or part of the proceeds earned from such conduct to defendant CALHOUN; and

g. defendant CALHOUN would from time to time beat and assault females working for him, and threatened females who left or attempted to quit working as prostitutes for him.

Overt Acts

3. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, defendants CALHOUN, MAYERS, and HARRIS, and others known and unknown to the grand jury, committed various overt acts within the Northern District of Ohio, and elsewhere, including but not limited to the following:

a. as early as some time in 2007, defendants CALHOUN and MAYERS posted a minor named "A.S." on Craigslist.com, and caused the minor to engage in acts of prostitution in Toledo-area hotels and at CALHOUN's residence;

b. in late August 2007, defendant CALHOUN posted and caused to be posted on Craigslist.com an advertisement for "K.H.", who was a minor;

c. in late August 2007, defendants CALHOUN and MAYERS drove "K.H.", a minor, to a hotel to engage in prostitution;

d. on or about September 4, 2007, defendants CALHOUN and MAYERS posted on Craigslist.com in the Toledo area a "3-girl" post with MAYERS, another individual, but not indicted herein, and a minor, "K.H.";

e. in late 2007, defendant MAYERS and "D.W." an individual not indicted herein, traveled to Detroit, Michigan, from Toledo, Ohio, in order to engage in acts of prostitution while working for defendant CALHOUN;

f. in late May 2008, defendants CALHOUN, MAYERS, and HARRIS drove from Toledo, Ohio, to Louisville, Kentucky, in order for MAYERS and others to engage in prostitution;

g. in late June 2008, defendants CALHOUN, MAYERS, and HARRIS again drove from Toledo, Ohio to Louisville, Kentucky, in order for MAYERS and others to engage in prostitution;

h. during late June 2008, while in Louisville, Kentucky, defendant CALHOUN posted and caused to be posted ads for females he had transported there to engage in prostitution;

i. on October 10, 2008, defendant MAYERS and another female, "W.H.", were arrested in Monroe, Michigan, after soliciting an undercover agent for an act of prostitution;

j. prior to and during defendant MAYERS' travel to Monroe, Michigan, on October 10, 2008, an ad was posted on Craigslist.com on behalf of "Mia", a name used by MAYERS, offering hourly rates and a "two-girl" show;

k. on or about March 23, 2009, "E.M.", an individual not indicted herein, was arrested by the Toledo Police Department at 2724 Fremont, Apt. B, in Toledo, Ohio, after soliciting an undercover officer for a commercial sex act;

l. from on or about April 1, 2009, to at least April 8, 2009, several females, not indicted herein, occupied rooms at the Motel 6 located at 5335 Heatherdowns Boulevard, in Toledo, Ohio, in order to engage in prostitution for the benefit of defendant CALHOUN;

m. on or about April 14, 2009, defendant MAYERS was dropped off at a Greyhound Station by defendant CALHOUN, intending to travel to New York City, New York, to engage in prostitution;

n. at some time in April 2009, defendant CALHOUN threatened a female named "J.M.", and prevented her from leaving CALHOUN's residence where she was being required to engage in acts of prostitution;

o. on April 22, 2009, defendant CALHOUN, following the execution of a search warrant at 1358 Brook Park Drive, Apt. 7, in Toledo, Ohio, falsely advised law enforcement agents that he "is not pimping anyone, and never has;"

p. on or about May 10, 2009, defendant MAYERS took a bus with another individual to Ft. Wayne, Indiana, in order to engage in acts of prostitution and raise money for defendant CALHOUN;

q. over the period of this conspiracy, defendant CALHOUN would post and cause to be posted ads on Craigslist.com, for "D.W.", not indicted herein, for which "D.W." would pay CALHOUN out of the proceeds of acts of prostitution committed in Toledo, Ohio; Detroit, Michigan; and New York, New York; and

r. over the period of this conspiracy, defendant MAYERS traveled to New York, New York, on behalf of and at the request of defendant CALHOUN, on as many as 20

occasions, to engage in acts of prostitution for which MAYERS would turn over the proceeds to CALHOUN.

All in violation of Title 18, United States Code, Section 371.

Count 2

The Grand Jury further charges:

4. From on or about August 1, 2007, and continuing through early September 2007, in the Northern District of Ohio, and elsewhere, the defendants ROY D. CALHOUN, aka "Lucky", and MARISSA M. MAYERS, aka "Mia" and "Jewels", did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide and obtain by any means, a minor under the age of 18, namely, "K.H.", knowing that "K.H." had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

Count 3

The Grand Jury further charges:

5. From some time in 2007, and continuing to at least December 19, 2007, the exact dates unknown to the grand jury, in the Northern District of Ohio, and elsewhere, the defendants ROY D. CALHOUN, aka "Lucky", and MARISSA M. MAYERS, aka "Mia" and "Jewels", did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide and obtain by any means, a minor under the age of 18, namely, "A.S.", knowing that "A.S." had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

Count 4

The Grand Jury further charges:

6. From on or about May 10, 2009, and continuing to at least May 16, 2009, in the Northern District of Ohio, and elsewhere, the defendants ROY D. CALHOUN, aka "Lucky", and MARISSA M. MAYERS, aka "Mia" and "Jewels", and DAMIAN J. HARRIS, did knowingly, persuade, induce, entice, and coerce other individuals to travel in interstate commerce, that is, from Toledo, Ohio, to Fort Wayne, Indiana, and back, to engage in prostitution, and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(a).

Count 5

The Grand Jury further charges:

7. From on or about March 15, 2009, and continuing to on or about April 22, 2009, in the Northern District of Ohio, and elsewhere, the defendant ROY D. CALHOUN, aka "Lucky", did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide and obtain by any means, a person, namely "J.M.", knowing and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion would be used to cause "J.M." to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

Count 6

The Grand Jury further charges:

8. On or about October 10, 2008, in the Northern District of Ohio, and elsewhere, the defendants ROY D. CALHOUN, aka "Lucky", and MARISSA M. MAYERS, aka "Mia" and

“Jewels”, did knowingly transport and cause to be transported another individual, namely “W.H.”, in interstate commerce, that is, from Toledo, Ohio, to Monroe, Michigan, with the intent that “W.H.” engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421 and 2.

Count 7

The Grand Jury further charges:

9. From on or about May 20, 2008, and continuing to on or about June 1, 2008, in the Northern District of Ohio, and elsewhere, the defendants ROY D. CALHOUN, aka “Lucky”, MARISSA M. MAYERS, aka “Mia” and “Jewels”, and DAMIEN J. HARRIS, did knowingly transport and cause to be transported other individuals, in interstate commerce, that is, from Toledo, Ohio, to Louisville, Kentucky, and back, with the intent that such individuals engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421 and 2.

Count 8

The Grand Jury further charges:

10. From on or about June 15, 2008, and continuing to on or about July 1, 2008, in the Northern District of Ohio, and elsewhere, the defendants ROY D. CALHOUN, aka “Lucky”, MARISSA M. MAYERS, aka “Mia” and “Jewels”, and DAMIEN J. HARRIS, did knowingly transport and cause to be transported other individuals, in interstate commerce, that is, from Toledo, Ohio, to Louisville, Kentucky, and back, with the intent that such individuals engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421 and 2.

Count 9

The Grand Jury further charges:

11. On or about April 14, 2009, in the Northern District of Ohio, and elsewhere, the defendant ROY D. CALHOUN, aka "Lucky", did knowingly transport and cause to be transported in interstate commerce, that is, from Toledo, Ohio, to New York, New York, and back, another individual, with the intent that such individuals engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421 and 2.